

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
) Criminal No. 04-10336-NMG
JULIO SANTIAGO et al.)
 Defendants)

GOVERNMENT'S MOTION FOR EXTENSION OF TIME

The United States, through the undersigned attorney, respectfully requests that the date for the government to file a response pursuant to Local Rule 7.1(B)(2) to Defendant Jose Rodriguez's Motion to Suppress, be continued until April 21, 2006. As grounds for this motion, the government states that the undersigned prosecutor needs additional time to prepare an adequate response Rodriguez's motion.

On March 23, 2006, Rodriguez, having retained new counsel, filed a Motion to Suppress "the fruits of a police stop in which he was a passenger and the subsequent searches conducted thereafter." The motion was filed on the date of a status conference in which the Court was to set a trial date. All previously-filed motions to suppress had been heard and denied. The Court gave the government 21 days to file a response. On March 27, 2006, the government filed a Motion to Strike the suppression motion on the basis of its untimely filing. That motion is presently pending.

Since that date, the undersigned prosecutor has been immersed in several active cases, including United States v.

Arlindo Dossantos et al., No. 01-10279-DPW; United States v. Sophoan Oung et al., No. 05-10262-PBS; United States v. Michael Peralta, 06-1082-JGD; and Commonwealth v. Timothy White, No. 03-0154, as well as several time-consuming investigations. The additional time requested will allow the undersigned prosecutor sufficient time to prepare a cogent response to the defendant's motion.

Counsel for Rodriguez, Robert Sheketoff, assents to the extension of time.

WHEREFORE, the United States respectfully requests an extension of time for the government to file a response to the Motion to Suppress until April 21, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/William F. Bloomer
William F. Bloomer
Assistant U.S. Attorney

Dated: 14 April 2006

CERTIFICATE OF SERVICE

I, William F. Bloomer, hereby certify that this document filed through the ECF system on April 14, 2006, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non registered participants this date via US Postal Service, postage prepaid.

/s/William F. Bloomer
WILLIAM F. BLOOMER

Date: 14 April 2006